

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,  
Plaintiff,

v.

PABLO BORRERO HERNANDEZ  
Defendant.

**Criminal No. 99-267 (JAF)**

**INFORMATIVE MOTION AND REQUEST FOR  
CONTINUANCE OF REVOCATION HEARING**

**TO THE HONORABLE COURT:**

**COMES NOW** the United States of America, by and through the undersigned attorney, and very respectfully states and prays as follows:

1. In the present case, a revocation hearing was set for August 31, 2005. The United States was ready to proceed on that date and the witness that was to be called by the United States, that is, a local police officer from the Drug Division in Yauco, had been requested to appear and was available to testify before this Honorable Court.

2. On August 30, 2005, a day before the hearing, the defense filed a Motion for Continuance requesting that the revocation hearing be scheduled for a date after the trial regarding the drug charges was held in local courts. The defense alleged that the defendant wished to testify before this Honorable Court and did not want to waive his Fifth Amendment right to remain silent prior to the state trial. At that time, the state trial was to take place on September 9, 2005.

3. The United States has learned that the state trial commenced on September 20, 2005 and is due to continue on October 5, 2005. The facts surrounding the drug charges that are pending before the local courts are the basis to seek revocation.

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4. Consonant with the previous request made by the defense, and in light of the fact that the state trial has commenced and will continue on October 5, 2005, we respectfully request that the revocation hearing be continued and scheduled until after the latter date.

**WHEREFORE** it is very respectfully requested that this Honorable Court take notice of the above and continue the revocation hearing.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 22<sup>nd</sup> day of September, 2005.

**H.S. GARCIA**  
United States Attorney

S/ Jenifer Y. Hernandez Vega  
**Jenifer Y. Hernández Vega**  
**USDC No. 216002**  
Assistant U.S. Attorney  
U.S. Attorney's Office  
Torre Chardon, Suite 1201  
Hato Rey, P.R. 00918

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY**, that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:  
**Victor González-Bothwell, Esq**

S/ Jenifer Y. Hernandez Vega  
**Jenifer Y. Hernández Vega**